

MICHAEL W. BOLECHOWSKI (SBN: 118725)
MARK C. RASKOFF (SBN: 72330)
MARY A. KIKER (SBN: 137824)
BISHOP, BARRY, HOWE, HANEY & RYDER
2000 Powell Street, Suite 1425
Emeryville, California 94608
Telephone: 510-596-0888
Facsimile: 510-596-0899

Attorneys for all Defendants except Prasad Lakireddy

IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JANE DOE I; JANE DOE II; LAKSHMI and JARMANTI PRATTIPATI as Parents and Successors in Interest of CHANTI JYOTSNA DEVI PRATTIPATTI; JANE DOE III; JANE DOE IV; JANE DOE V; DANE DOE VI; JANE DOE VII; JANE DOE VIII; SREEKANTH KOLLIPARA; and All Others Similarly Situated

Plaintiffs.

vs.

LAKIREDDY BALI REDDY, an individual; VIJAY KUMAR LAKIREDDY, an individual; PRASAD LAKIREDDY, an individual; JAYAPRAKASH REDDY LAKIREDDY, an individual; VENKATESWARA REDDY LAKIREDDY, an individual; and the businesses they controlled and/or operated, including PASAND MADRAS CUISINE, a California corporation; PASAND, INC., a California corporation; LAKIREDDY INVESTMENT CO., a California limited liability corporation; L.B. REDDY ESTATE CO., a California limited liability company; JAY CONSTRUCTION, a California sole proprietorship; ACTIVE TECH SOLUTIONS, a California corporation; VANI COMPUTER SOLUTIONS, a California limited liability corporation; LAKIREDDY BALI REDDY d/b/a REDDY REALTY CO., a California sole proprietorship; and ROES 1 through 100, inclusive.

Defendants.

Case No. C-02-5570-WHA

**RESPONSES TO PLAINTIFF JANE DOE
I'S INTERROGATORIES TO
DEFENDANT L.B. REDDY ESTATE CO.,
SET ONE.**

1 PROPOUNDING PARTY: PLAINTIFF JANE DOE I

2 RESPONDING PARTY: L.B. REDDY ESTATE CO.

3 SET NUMBER: ONE

4 INTERROGATORY RESPONSES

5 1. State YOUR full name and the address of YOUR principal place of business.

6 **RESPONSE:** L.B. Reddy Estate Co. LLC, 2278 Shattuck Ave. Berkeley, California 94704

7
8 2. State all other names that YOU have used (including fictitious business names)
9 between January 1, 1982 and the present.

10 **RESPONSE:** None

11
12 3. State YOUR legal status (i.e. corporation, partnership, joint venture,
13 unincorporated association, etc.) and the place and date YOU were formed.

14 **RESPONSE:** Partnership 6/2/1998, Berkeley, California

15
16 4. IDENTIFY every person and ENTITY that has an ownership interest in YOU
17 and state the size of that interest (i.e. 100 percent, 25 percent, etc.) (If there have been any
18 changes in ownership since January 1, 1990, describe each change in ownership.)

19 **RESPONSE:** Lakireddy Bali Reddy, Vijay Kumar Lakireddy, Jayaprakash Reddy Lakireddy,
20 Prasad Lakireddy, there have never been ownership interests expressed in shares.

21
22 5. IDENTIFY YOUR officers and directors.

23 **RESPONSE:** None

24
25 6. IDENTIFY YOUR ORGANIZATIONAL DOCUMENTS.

26 **RESPONSE:** Organizational documents consist of a partnership agreement.

27
28 7. IDENTIFY every ENTITY in which you held, directly or indirectly, a 10 percent

BISHOP, BARRY, HOWE, HANEY & RYDER
A PROFESSIONAL CORPORATION
2000 Powell Street, Suite 1425, Emeryville, California 94608
Tel. No. (510) 596-0888 Facsimile (510) 596-0899

1 or greater ownership interest at any time between January 1, 1990 and the present.

2 **RESPONSE:** None

3
4 8. Did YOU ever EMPLOY any of the PLAINTIFFS to perform work in
5 California?

6 **RESPONSE:** No

7
8 9. If YOUR answer to Interrogatory No. 8 is yes, list the PLAINTIFFS whom you
9 EMPLOYED to perform work in California and provide their respective dates of
10 EMPLOYMENT.

11 **RESPONSE:** N/A

12
13 10. For each of the PLAINTIFFS listed in response to Interrogatory No. 9,
14 IDENTIFY all DOCUMENTS that report the number of hours worked by the PLAINTIFF as
15 YOUR EMPLOYEE in California and/or the WAGES paid to PLAINTIFF for such work.

16 **RESPONSE:** N/A

17
18 11. For each of the PLAINTIFFS listed in response to Interrogatory No. 9, state
19 whether YOU ever EMPLOYED the PLAINTIFF to perform work in California OFF THE
20 BOOKS.

21 **RESPONSE:** No

22
23 12. For each of the PLAINTIFFS listed in response to Interrogatory No. 9, provide a
24 complete itemization of all money and other things of value that were provided to the
25 PLAINTIFF (or his or her family) as full or partial compensation for the PLAINTIFF labor as
26 YOUR employee in California and that are not reported in the records YOU identified in
27 response to Interrogatory No. 10.

28 **RESPONSE:** N/A

BISHOP, BARRY, HOWE, HANEY & RYDER
A PROFESSIONAL CORPORATION
2000 Powell Street, Suite 1425, Emeryville, California 94608
Tel. No. (510) 596-0888 Facsimile (510) 596-0899

1 13. For each of the PLAINTIFFS listed in response to Interrogatory No. 9, provide a
2 complete listing of the hours worked by the PLAINTIFF as YOUR employee in California that
3 are not reported in the records YOU identified in response to Interrogatory No. 10.

4 **RESPONSE:** N/A

5
6 14. IDENTIFY every person (other than the PLAINTIFFS) whom YOU
7 EMPLOYED to perform work in California at any time between January 1, 1990 and the
8 present and provide their respective dates of EMPLOYMENT.

9 **RESPONSE:** NONE

10
11 15. For each person identified in response to Interrogatory No. 14, state whether
12 YOU ever EMPLOYED the person to perform work in California OFF THE BOOKS.

13 **RESPONSE:** NONE

14
15 16. For each of the PLAINTIFFS, IDENTIFY every person and ENTITY that
16 EMPLOYED the PLAINTIFF to perform work in California prior to January 1, 2000 and
17 provide the dates of EMPLOYMENT.

18 **RESPONSE:**

- 19 1. DOE I often socialized at restaurant defendant Pasand Madras Cuisine, but never
20 was employed by any defendant.
21 2. DOE II often socialized at restaurant defendant Pasand Madras Cuisine, but never
22 was employed by any defendant.
23 3. DOE III Worked for various restaurants owned by defendants including Pasand
24 Madras Cuisine, as well as being employed by Jay Construction from 1995 until
25 the end of 1999.
26 4. DOE IV Worked for Jay Construction from 1995 until 1999. DOE IV was paid by
27 Active Tech Solutions, but never performed any actual work for Active Tech
28 Solutions.

BISHOP, BARRY, HOWE, HANEY & RYDER
A PROFESSIONAL CORPORATION
2000 Powell Street, Suite 1425, Emeryville, California 94608
Tel. No. (510) 596-0888 Facsimile (510) 596-0899

- 1 5. DOE V Worked for Jay Construction from 1995 until 1999.
2 6. DOE VI Worked for Jay Construction from 1995 until 1999.
3 7. DOE VII was never employed by a defendant.
4 8. DOE VIII worked for Pasand Madras Cuisine from September of 1999 until
5 January of 2000.
6 9. SREEKANTH KOLLIPARA came to the United States in December of 1999 to
7 work for Active Tech Solutions, but never worked for Active Tech Solutions.
8 10. CHANTI JYOSTHNA DEVI PRATTIPATI often socialized at restaurant Pasand
9 Madras Cuisine, but never was employed by any defendant.

BISHOP, BARRY, HOWE, HANEY & RYDER
A PROFESSIONAL CORPORATION
2000 Powell Street, Suite 1425, Emeryville, California 94608
Tel. No. (510) 596-0888 Facsimile (510) 596-0899

10
11
12 Dated: March 17, 2003

13 BISHOP, BARRY, HOWE, HANEY & RYDER
14
15
16
17 By: 
18 MICHAEL W BOLECHOWSKI
19 MARK C. RASKOFF
20
21
22
23
24
25
26
27
28

VERIFICATION

RESPONSES TO PLAINTIFF'S INTERROGATORIES TO L.B. REDDY ESTATE CO.

- [] I, Lakireddy Bali Reddy, am a party to this action; the attached document is true of my own knowledge, except as to the matters that are stated there upon my information and belief or as to matters within the knowledge of my counsel of record or their agents, and as to those matters I believe them to be true.

[x] I am an officer or agent of the party providing this Verification, and am authorized to make this Verification for and on its behalf, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.

[] I am one of the general partners of the partnership providing this Verification, and am authorized to make this Verification for and on behalf of the partnership, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.

[] I am one of the attorneys for the party required to provide this verified Answer; I make this Verification on behalf of said party who is absent from the County of Alameda, California, where I have my office; I have read the attached Answer and know its contents; I am informed and believe and on that ground allege that the matters stated in it are true.

[] I am one of the attorneys for the party required to provide this verified response. I make this Verification for the reason checked below:

[] because the facts alleged in the attached document are within my own personal knowledge, and are not within the knowledge of the responding party or any of its agents or employees;

[] because the responding party's whereabouts are unknown to me, said party has failed to communicate with me concerning the subject litigation, and it is impossible, impractical or futile to secure said party's Verification to the attached document;

The matters stated in the attached document are true of my own knowledge, except as to any matters stated therein upon information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Verification was executed on 3-13, 2003 at Lompoc, California.

Lakireddy Bali Reddy